

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE; and
MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; CHAD F. WOLF, in his
official capacity as Acting Secretary of the
United States Department of Homeland
Security; and MATTHEW ALBENCE, in his
official capacity as Acting Director of U.S.
Immigration and Customs Enforcement,

Defendants.

Civil Action No. 1:20-cv-11283-ADB

DECLARATION OF STUDENT #7

I, Student #7, hereby state under the penalty of perjury that the following statements are true and accurate to the best of my knowledge:

1. I am a doctoral student at the Massachusetts Institute of Technology ("MIT"). I am not revealing my name or certain facts that may reveal my identity due to fears that, based my participation in this litigation or information disclosed in this declaration, I could face retaliation from immigration authorities or harm in my home country or elsewhere.

2. I am from Hungary and am in the United States on an F-1 visa. Prior to coming to the United States and matriculating at MIT, I spent two-and-a-half years in Germany, where I earned a Master's degree.

3. I have four classes left to complete my program, in addition to research work. I plan to register for at least two classes in the fall 2020 semester. Under MIT's 2020-2021 operational plan, all coursework in my degree program will take place online. My research this fall would also be conducted remotely.

4. I understand that I may soon be required to depart the United States under the COVID-19 and Fall 2020 directive issued by United States Immigration and Customs Enforcement. It will not be possible for me to return to live with my family in Hungary if I am forced to leave the United States. I am estranged from my parents based on their role in certain traumatic experiences I endured as a child. I also have two brothers, but both lack the financial resources to accommodate me.

5. Returning to Hungary would pose a great hardship in other ways, including:

a. I am a lesbian, and the culture and political environment in Hungary is very homophobic. For example, the government has recently sought to repeal measures protecting LGBTQ rights, and police often fail to investigate hate crimes committed against LGBTQ people. Returning there would thus require me to suppress core aspects of my identity to preserve my safety. I would certainly be stigmatized and would also fear for my safety if my sexual orientation were revealed.

b. I have mental health issues for which I was recently hospitalized and am now in active outpatient treatment. I have health insurance only in the United States. Leaving the country would deprive me of access to critical medical care that I require.

c. My entire life is in the United States, including my friends, medical and mental health providers, and all of my possessions. I depend on a social support system in the United States consisting of my partner, friends, and others. I would lose that support if forced to leave the country. Although social support is important to everyone, it is especially critical for me, given my recent mental health issues.

d. Leaving the United States would also be very costly for me. I have recently signed a lease for housing near MIT's campus. If I were forced to leave the country, I would either have to continue paying rent through July 31, 2021, for a total expense of more than \$10,000, or ask my partner or friends to assume that costly obligation.

6. If forced to leave the United States, I would likely try to continue my studies in Germany. But this too would pose substantial challenges:

a. First, I am uncertain whether I would be able to enter the country at all, due to, among other things, COVID-19-related travel restrictions.

b. Second, while I have friends in Germany who could possibly accommodate me for a short time, I would need to find permanent housing on short notice. Doing so may prove prohibitively expensive due to Germany's high cost of living, particularly in light of the significant amount of money I have already committed to my housing here and the health and safety challenges caused by the COVID-19 pandemic.

c. Third, participating in online courses from Germany would be very difficult. In addition to the uncertainty of my housing arrangements there and likely loss of access to needed mental health care, the six-hour time difference would require

me to maintain unusual hours that would impair my performance in those courses and my other research and academic activities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, July 13, 2020

/s/ Student #7
Student #7